

Federal Communications Commission
Secretary of the FCC, Room 222
1919 M Street, N.W.
Washington, D.C. 20554

May 19, 1998

RE: RM 9267

Dear Commission:

I am writing this as a licensed, active amateur radio operator for the past 47 years, and as a Alternate Arizona State RACES Officer, active in public service and emergency communications in Arizona over the past 31 years. I wish to go on record as strongly opposed to the RM-9267 petition for the following reasons:

1) The proposed frequency bands of 420 to 430 MHz and 440 to 450MHz are used extensively in Arizona to support many services used for public service and emergency communications. They contain point to point linking, control, amateur TV and many repeater systems. The topography of our state is such that amateurs use linked 440 to 450 MHz repeaters and remote base stations on mountain tops to provide wide area communications. These wide area repeaters are then linked using 420 to 430 MHz point to point, mountain top to mountain top. There are over two hundred fifty (250) repeaters operating in the state in the 440 to 450 MHz spectrum which provide valuable communications to many remote locations as well as saturated coverage of metropolitan areas.

There are well over 200 link transmitters and receivers which are used to tie together these repeaters into a state wide communications networks. There is no substitute available for these strategically important (to public service and emergency communication) functions. I personally use several of these SYSTEMS each day, as do many hundreds of other Arizona amateurs.

2) While it is true that amateur radio has been a successful secondary user to the US Government radio location operations on these bands, RM-9267 proposes that PMRS would become the primary user.

We would have to share, on a secondary basis, with regular 2 way commercial radio users, who would use repeaters, and base stations just like amateurs do on the 450-470 MHz band. Assigning us to secondary status with a technically very similar service will render amateur operations impossible.

The FCC seemed to recognize this years ago when they reallocated 421-430 MHz across the northern 60 miles of the US, since they REMOVED the amateur service from this spectrum in those areas at the same time they allocated it to the PMRS!

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This service uses the same type of equipment and emissions that is employed by amateurs. There is no technical solution which would allow these two services to occupy this same spectrum without serious interference. This would preclude amateur radio operation as a secondary user in this entire spectrum.

3) During emergency drills and during real emergencies there is sometimes no other type of communications which can be used to provide necessary communications to insure the safety and well being of our citizens. In recent drills, which I personally have participated in as a RACES officer, the Division of Emergency Management of the State of Arizona at their communications emergency operations center (EOC) has demonstrated that these systems can provide a crucial link when other systems are inoperable.

In a '100 year' flood disaster in the 70's, these amateur radio 440-450 MHz repeaters and remotely controlled base stations and their linked systems provided the ONLY COMMUNICATIONS LINK AVAILABLE FOR OUR GOVERNOR for several days to small communities isolated completely by the flood.

I strongly urge the commission to deny RM-9267.

Yours truly,

A handwritten signature in cursive script, reading "Roderick J. O'Connor".

Roderick J. O'Connor, W7EKV
Alternate Arizona State RACES Officer
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Phoenix, Arizona 85018